

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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WALTER BECK CORPORATION)  
d/b/a THE RAINBOW INN, )

Plaintiff, )

vs. )

Civil Action

No. 04-348-ERIE

SAFECO CORPORATION, )  
AMERICAN ECONOMY )  
INSURANCE COMPANY and )  
AMERICAN STATES )  
INSURANCE COMPANY, )

Defendants. )

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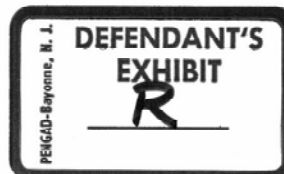
DEPOSITION OF PAUL G. SMITH

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1 P. Smith - by Mr. Victoria

2 it says safeco with a logo there, correct?

3 A. Yes.

4 Q. And on the next page and on numerous  
5 subsequent pages, the Safeco name and logo is  
6 at the top left-hand corner of the page,  
7 correct?

8 A. Yes.

9 Q. Now, if you can flip back to page  
10 199, that's a pretty good ways in there. It  
11 states at the bottom there is a name and  
12 address, correct?

13 A. Yes.

14 Q. That states American States  
15 Insurance Company, correct?

16 A. Yes.

17 Q. Could you tell me why the three  
18 separate entities are referenced at different  
19 points in the policy?

20 A. Well, I believe Safeco is the  
21 holding company for a number of insurance  
22 companies. In this particular case, this  
23 policy was written under the American Economy.

24 Q. So your testimony is American  
25 Economy has issued this insurance policy,

1 P. Smith - by Mr. Victoria

2 correct?

3 A. Yes, sir.

4 Q. What explains the American States  
5 Insurance Company's address on page 199?

6 A. I can't answer that, but I have an  
7 opinion.

8 Q. What is that?

9 A. Safeco did purchase American States.  
10 This is the American States original home  
11 office on Meridian. When I left Safeco, it was  
12 the regional office for all of Safeco. But  
13 American Economy was part of the American  
14 States, and Safeco purchased all of those  
15 companies.

16 Q. So the structure is Safeco at the  
17 top, and then American States Insurance  
18 Companies which I guess is what's referenced  
19 here is another entity beneath Safeco, and then  
20 American Economy is part of American States  
21 Insurance Companies?

22 A. That's what I am saying. I can't  
23 say that for certain. I know Safeco is the  
24 holding company for a number, many insurance  
25 companies. American Economy was the one in